

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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STEPHANIE THOMPSON, *on behalf of herself and all  
others similarly situated*,

Plaintiff,

Case No. 20-CV-651(MKB)(SJB)

- against -

GLOBAL CONTACT SERVICES, LLC, EUGENE  
OHEMENG, FRANK CAMP, ANTOINETTE CURRIE,  
and JAMIE HOFFMAN,

Defendants.

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**THE GCS DEFENDANTS' NOTICE OF MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE THAT, defendants Global Contact Services, LLC (“GCS”), Frank Camp, Antoinette Currie, and Jamie Hoffman (collectively, the “GCS Defendants”), upon the accompanying GCS Defendants’ Memorandum of Law in Support of Its Motion for Partial Summary Judgment, GCS Defendants’ Statement of Undisputed Material Facts Pursuant to Local Rule 56.1, and the Declaration of Frank Camp, and the exhibit attached thereto, and upon all of the pleadings and proceedings herein, will move this Court before the Honorable Margo K. Brodie at the U.S. District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201 on a date and at a time to be designated by the Court, for an order: (1) granting the GCS Defendants’ summary judgment motion and dismissing Plaintiff’s First Cause of Action in its entirety; and (2) granting such other and further relief as the Court deems appropriate, including the GCS Defendants’ fees and costs.

Dated: New York, New York  
December 7, 2020

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By s/ Aaron Warshaw  
Aaron Warshaw  
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Attorneys for Defendants  
*Global Contact Services, LLC, Frank  
Camp, Antoinette Currie, and Jamie  
Hoffman*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 7, 2020, I served true and correct copies of the foregoing GCS Defendants' Notice of Motion for Partial Summary Judgment; GCS Defendants' Memorandum of Law in Opposition to Plaintiff's Motion for Conditional Collective Certification and In Support of Its Motion for Partial Summary Judgment; GCS Defendants' Statement of Undisputed Material Facts Pursuant to Local Rule 56.1; and the Declaration of Frank Camp, and the exhibits attached thereto, via email upon the following:

C.K. Lee, Esq.  
Tenzin Tashi, Esq.  
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*Attorney for Plaintiff*

By: /s Aaron Warshaw  
Aaron Warshaw